

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

STATE FARM MUTUAL AUTOMOBILE INSURANCE)	
COMPANY and STATE FARM COUNTY MUTUAL)	
INSURANCE COMPANY OF TEXAS,)	
)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:19-cv-01491
)	
)	Hon. Ewing Werlein, Jr.
)	
NOORUDDIN S. PUNJWANI, M.D.;)	
PAIN ALLEVIATION & INTERVENTIONAL NEEDS,)	
LLC n/k/a PAIN ALLEVIATION & INTERVENTIONAL)	
NEEDS, PLLC; BARKETALI M. ROOPANI; ANIL B.)	
ROOPANI; and SOHAIL B. ROOPANI;)	
)	
Defendants.)	

**PLAINTIFFS’ AND DEFENDANTS’ STIPULATION REGARDING
CORRECTED COMPLAINT EXHIBIT**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs State Farm Mutual Automobile Insurance Company (“State Farm Mutual”) and State Farm County Mutual Insurance Company of Texas (“State Farm County”) (collectively, “Plaintiffs”) and Defendants Nooruddin S. Punjwani, Pain Alleviation & Interventional Needs, PLLC, Barketali M. Roopani, Anil B. Roopani, and Sohail B. Roopani (collectively, “Defendants”) as follows:

Exhibit 4 to Plaintiffs’ Complaint (ECF No. 1, Document 1-5), entitled the “RICO and Demand Appendix,” contains certain information regarding the 873 patient claims at issue in this lawsuit, including the settlement amount that Plaintiffs ultimately paid on those claims that settled prior to the time of filing (*see id.*, column K). Recently, Plaintiffs discovered that four out of the 800+ claims on Exhibit 4 resulted in a settlement in which the release signed by the plaintiff/claimant contained a confidentiality clause. While Plaintiffs contend that the

confidentiality clauses are unenforceable as to them and the filed Complaint does not otherwise identify by name the plaintiffs/claimants at issue, out of an abundance of caution, Plaintiffs nevertheless request to file a corrected version of Exhibit 4 that redacts the settlement amounts paid on those four claims. Counsel for defendants have agreed to the proposed stipulation.

Accordingly, Plaintiffs, with Defendants' consent, respectfully request that the Court direct the Clerk to strike the currently-filed Exhibit 4 to Plaintiffs' Complaint (ECF No. 1, Document 1-5) and replace it with the corrected Exhibit 4 attached hereto.

KATTEN MUCHIN ROSENMAN, LLP

By: /s/ Jared T. Heck
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Dated: April 8, 2020

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("P.A.I.N."); Barketali M. Roopani; Anil
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"Roopani Defendants")*

Dated: April 8, 2020

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APPROVED:

Signed on this ____ day of April, 2020.

Honorable Ewing Werlein, Jr
United States District Judge